

**NORGAARD O'BOYLE & HANNON**

184 Grand Avenue

Englewood, New Jersey 07631

Telephone Number (201) 871-1333

Facsimile Number (201) 871-3161

*Attorneys for Debtors*

By: Karl J. Norgaard, Esq.

knorgaard@norgaardfirm.com

In Re:

HASHAM SYED and

NIGHAT SYED,

Debtors.

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
NEWARK VICINAGE

Chapter 13

Case No. 22-17137-VFP

HEARING DATE: March 2, 2023

**CERTIFICATION IN OPPOSITION TO CONFIRMATION OF MODIFIED CHAPTER  
13 PLAN FILED BY SOLA REALTY LLC**

I, Hasham Syed, declare under penalty of perjury as follows:

1. I am the Debtor in the above captioned matter and I am familiar with the facts contained in this Certification in opposition to the Objection to Confirmation of my Chapter 13 plan filed by SOLA REALTY LLC docket entry 50.

2. Although the objection asserts that my modified plan as it was not filed in good faith, this assertion is incorrect for the reasons set forth herein and as well as for the reasons set forth in my opposition to Chapter 13 trustee's objection to confirmation of my modified plan as well as the opposition to the objection filed on behalf of Charles Forman, as Chapter 7 Trustee for Prestige America Mfg. Corp. which are incorporated by reference as if stated at length herein.

3. The Debtor can avoid the judgment lien of Sola Realty LLC as the chapter 13 Trustee has agreed to allow the debtor to assert its powers set forth in 11 U.S.C. sections 544, 547 and 548.

4. A modified plan is being filed to address the other objections asserted Sola Realty LLC.

5. For the aforementioned reasoning, the Creditor respectfully requests that the Court confirm my second modified chapter 13 plan.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Hashmi Syed  
Date: February 28, 2023 Hashmi Syed